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Subject: Grandfathered status comment
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This concerns grandfathered status under collectively bargained group plans (self insured) and the percentage of employer contributions.

What is the rule concerning employer contribution decrease of greater than 5% for collectively bargained group plans (self insured) either in effect prior to March 2010 or after? It would seem that if changes to contributions greater than 5% have been collectively bargained, this should not impact grandfathered status. Example - we are trying to achieve more than a 0% contribution for single coverage for one of our nine collective bargaining units. All other similarly situated individuals contribute at least 20% for this coverage. We are making other concessions to obtain this and believe this will encourage individuals to make better health plan choices.